

## UNITED STATES DISTRICT COURT

MAY 14 2016

for the  
Southern District of Texas

Clerk of Court

United States of America )

v. )

Javaid Muhammad )

Case No. M-16-0935-M )

Defendant

## CRIMINAL COMPLAINT

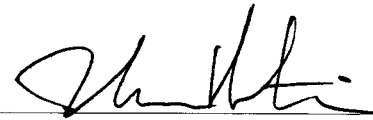
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 05/12/2016 in the county of Cameron in the Southern District of  
Texas, the defendant violated 18 U. S. C. § 1001  
, an offense described as follows:

Whoever in any any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully falsifies, conceals, or covers up by any trick, scheme, or device a material fact; makes any materially false, fictitious, or fraudulent statement or representation shall be fined or imprisoned not more than 5 years.

This criminal complaint is based on these facts:

SEE ATTACHMENT A


☒ Continued on the attached sheet.

Complainant's signature

FBI Special Agent Andrew Huminski

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/14/2016

Judge's signature

City and state: McAllen, Texas

United States Magistrate Judge Dorina Ramos

Printed name and title

**ATTACHMENT A**

On May 8, 2016, JAVAID MUHAMMAD (MUHAMMAD) unlawfully entered into the United States from Mexico and was subsequently arrested by agents of the United States Border Patrol (USBP). MUHAMMAD admitted to the USBP Agents to being a citizen of Pakistan who did not possess the necessary legal documents to enter, pass through, or remain in the United States. MUHAMMAD also admitted to illegally crossing the international boundary of the United States without prior inspection by a United States Immigration Officer, and also provided a sworn statement detailing his illegal travel from Pakistan to the United States.

On May 12, 2016, MUHAMMAD was interviewed by Special Agents of the FBI regarding his sworn statement made to the USBP at the time of his arrest and processing. During this interview, MUHAMMAD stated he currently resided in Pakistan, that he had never visited nor resided in Ecuador or Chile, and that he had never been issued a passport from a country other than Pakistan.

The FBI was in possession of records consisting of photographs and travel records, as well as written accounts from other government agencies, which show that the statements MUHAMMAD made during his interviews by the USBP and the FBI were materially false, fictitious, or fraudulent. When confronted with photographs of his Ecuador passport, and his Republic of Chile Residence Card, MUHAMMAD admitted the statement he provided to the USBP was false, and also admitted lying to the FBI during his interview.

AO 91 (Rev. 2/09) Criminal Complaint

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**ATTACHMENT A**

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*DMH*



FBI Special Agent Andrew Huminski

Sworn to before me and subscribed in my presence,



United States Magistrate Judge Dorina Ramos

05/14/2016